

The Aluminum Association

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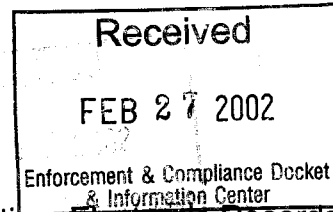


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February 22, 2002

Enforcement and Compliance Docket
and Information Center
U.S. Environmental Protection Agency
Sam Nunn Atlanta Federal Center
1200 Pennsylvania Ave, NW
Washington, DC 20460



RE: Comments on Establishment of Electronic Reporting, ~~Electronic Records~~
(Docket Number EC-2000-007)

Dear Sir or Madam:

The Aluminum Association submits these comments in response to the Environmental Protection Agency's (EPA) proposed rule to establish means of electronic reporting and record keeping (CFR Vol. 66, No 170). This rule proposes a set of criteria that reporting facilities must meet in order to report and retain records electronically. In general, these criteria specify that a system must produce unalterable records that are reproducible, secure, time stamped, auditable, and achievable. In addition, the system must support the use of electronic signatures and must be available for inspection.

The Aluminum Association agrees that electronic reporting and record keeping can satisfy EPA's stated goals of reducing reporting costs, improving data quality, and improving access and speed of access. However, The Association has three comments on the current proposal:


- The proposed rule sets forth guidelines and minimum requirements for an electronic reporting system without providing the technical details of how the system will be realized. EPA solicits comments on the technical feasibility of the proposed system, but the excessive vagueness of the

proposed rule leaves open the possibility that a system will be devised that satisfies the proposed outline, but whose implementation is unfeasible. The high costs of compliance with the outlined record keeping requirements is potentially in the millions of dollars, and well in excess of the \$40,000 per facility estimated in the proposed rule's preamble.

- Security requirements for electronic signature systems, as outlined in proposed letters of agreement, could require the installation and maintenance of dedicated, restricted access terminals, subject to third party audits. This would greatly reduce the cost effectiveness of the system by requiring retrofitting of potentially all equipment used to retain records that satisfy reporting requirements, and in addition would negate the supposed voluntary nature of the rule.
- Finally, given the lack of detail concerning the technical details of the proposed reporting system, The Association cannot at this time comment on the possibility of reporting CBI.

The Aluminum Association is in full agreement that electronic reporting and record keeping is a worthwhile reporting system, and welcomes this opportunity to comment. However, in light of the above concerns, The Association recommends that the current proposal be withdrawn.

Respectfully,

A handwritten signature in black ink, appearing to read "Charles Johnson", written in a cursive style.

Charles Johnson
Manager, Environment,
Health & Safety